

Sills Cummis & Gross
A Professional Corporation

The Legal Center
One Riverfront Plaza
Newark, New Jersey 07102
Tel: (973) 643-7000
Fax (973) 643-6500

101 Park Avenue
28th Floor
New York, NY 10178
Tel: (212) 643-7000
Fax: (212) 643-6500

Michael J. Geraghty
Direct Dial: 973-643-5548
Email: mgeraghty@sillscummis.com

September 25, 2023

Via ECF

Honorable Esther Salas, U.S.D.J.
United States District Court
District of New Jersey
M.L. King Federal Courthouse
50 Walnut Street
Newark, NJ 07102

Re: *Doremus Land 672 LLC v. Zariz Transport, Inc. et al.*
Civil Action No. 2:23-cv-02850-ES-AME

Dear Judge Salas:

On behalf of plaintiff Doremus 672 LLC, I write to request an adjournment of the October 16, 2023 return date of defendants' pending motion to dismiss the Complaint to November 13, 2023. Counsel for the defendants has graciously consented to my request.

As a result of the death of a member my family in the United Kingdom, I have to travel to the U.K. later this week to attend services next week. I will not be returning stateside until the end of next week.

Assuming my request is granted, counsel for the defendant and I have conferred and we have agreed to the following schedule for the filing of papers: plaintiff's opposition – October 23, 2023; defendants' reply – November 6, 2023. If the foregoing is satisfactory to the Court, I respectfully request that the adjournment be so ordered subject to the briefing schedule above.

I thank the Court for consideration of my request.

Respectfully,

Michael J. Geraghty
MICHAEL J. GERAGHTY

MJG/adp

cc: All counsel of record (via ECF)